

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA EX
REL. MARIA VALLADARES
KADZIELAWA, STATE OF HAWAII
EX *REL.* MARIA VALLADARES
KADZIELAWA, STATE OF
CALIFORNIA EX *REL.* MARIA
VALLADARES KADZIELAWA,
COMMONWEALTH OF VIRGINIA
EX *REL.* MARIA VALLADARES
KADZIELAWA, DISTRICT OF
COLUMBIA EX *REL.* MARIA
VALLADARES KADZIELAWA,

Relator/Plaintiff,

vs.

KAISER FOUNDATION
HOSPITALS and KAISER
FOUNDATION HEALTH PLAN,
INC.,

Defendants.

CIVIL No. 03-00631 DAE LEK
(Other Civil Action/*Qui Tam*)

**DECLARATION OF THOMAS R.
GRANDE**

DECLARATION OF THOMAS R. GRANDE

THOMAS R. GRANDE, being first duly sworn upon his oath,
deposes and states as follows:

1. I am one of the attorneys representing *Qui Tam* Relator/Plaintiff
in this case.

2. On May 4, 2004, the Plaintiff filed under seal with the Court a First Amended Complaint and Summons in a *qui tam* action.

3. On October 25, 2006, the Court ordered that the Plaintiff's Complaint, the Government's Notice of Election of Intervene in Part and Decline to Intervene in Part, and the October 25, 2006 Order be unsealed. It was further ordered the Government and the Relator would serve the Complaint, Summon, and October 25, 2006 Order upon the Defendants within 45 days.

4. On November 16, 2006, the Rule 16 Scheduling Conference set for November 27, 2006 was continued to February 2, 2007 at 9:00 a.m. before Judge Leslie E. Kobayashi.

5. Relator, the Government, and Defendants are currently negotiating a settlement of the claims and are actively attempting to resolve the case. Therefore, Plaintiff respectfully requests a 120-day extension of time within which to serve the First Amended Complaint and Summons upon Defendants from December 9, 2006 up to and including April 8, 2007.

6. Defendants have no objection to this Motion.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 29th day of November, 2006, at Honolulu, Hawaii.

/s/ THOMAS R. GRANDE
THOMAS R. GRANDE